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*Attorneys for Utilities, Inc. of Central Nevada*

**UNITED STATES BANKRUPTCY COURT**

**DISTRICT OF NEVADA**

In re:

CALDERA P&G,

Debtor.

Case No.: 12-22484-LBR  
Chapter 11

**DECLARATION OF TERESA  
VALENTINE**

Hearing Date: August 21, 2013  
Hearing Time: 2:00 PM  
Courtroom: 1

TERESA VALENTINE, being first duly sworn under oath, deposes and says:

1. I make this declaration in support of the Trustee's Motion to Modify Plan. The matters set forth in this declaration are based on my own personal knowledge. If called upon to testify, I am competent to testify as to the matters set forth herein.

2. I am the Managing Principal of Valentine Engineers, located at 15845 South 46<sup>th</sup> Street, Suite 144, Phoenix, Arizona 85048. I was retained by UICN to consult on the necessary remediation at the Willow Creek Property.

3. I have visited the effluent receiving and overflow ponds at the Willow Creek Property three times in the past few months. During these visits I have observed the ponds to be in continued disrepair. The pond liners are torn, the ponds are laden with debris and there

1 appears to be little to no maintenance of the ponds. As a result of the continued disrepair of the  
2 liner and lack of pond maintenance, the ponds are, and will continue to, experiencing further  
3 decline.

4 4. I have further discovered during my recent visits and discussions with local  
5 individuals, that people and pets have been seen in the ponds. Access to the ponds should be  
6 restricted immediately as the ponds have and continue to pose a health and safety risk to the  
7 community.  
8

9 I declare under penalty of perjury under the laws of the State of Arizona that the  
10 foregoing is true and correct and was executed this 20th day of August, 2013.  
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14 Teresa Valentine, Ph.D., PE  
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